

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

**DOUGLAS HANDSHOE**

**PLAINTIFF**

**VERSUS**

**CIVIL ACTION NO: 1:13CV251 LG JMR**

**AARON F. BROUSSARD, DANIEL ABEL,  
CHARLES LEARY, VAUGHN PERRET,  
CHRIS YOUNT, TROUT POINT LODGE  
LIMITED, NOVA SCOTIA ENTERPRISES, LLC**

**DEFENDANTS**

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**MOTION OF DEFENDANTS, CHARLES LEARY, VAUGHAN PERRET,  
AND TROUT POINT LODGE, LIMITED FOR PROTECTIVE ORDER**

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COME NOW Defendants, Charles Leary, Vaughan Perret and Trout Point Lodge, Limited, and show that on or about July 15, 2013 Plaintiff, Douglas Handshoe, served counsel for these Defendants with Plaintiff's Interrogatories to be Answered by Defendants Under Oath, Plaintiff's Request for Production of Documents to be Responded to by Defendant Under Oath, and Plaintiff's Request for Admission of Facts. On June 28, 2013 the Court entered its Order Staying Proceedings [Docket No. 18] staying, among other things, Plaintiff's discovery requests. Pursuant to Federal Rule of Civil Procedure 26 and Local Uniform Civil Rule 26 discovery, at the earliest, cannot be commenced until after the Case Management Conference, which has not yet been set.

Accordingly, Defendants, Charles Leary, Vaughan Perret and Trout Point Lodge, Limited, move for a protective order relieving them from responding to Plaintiff's Interrogatories

to be Answered by Defendants Under Oath, Plaintiff's Request for Production of Documents to be Responded to by Defendant Under Oath, and Plaintiff's Request for Admission of Facts.

RESPECTFULLY SUBMITTED this the 25<sup>th</sup> day of July, 2013.

CHARLES LEARY, VAUGHN PERRET,  
AND TROUT POINT LODGE, LIMITED,

By: s/ Henry Laird  
Henry Laird, MS Bar No. 1774

**CERTIFICATE OF SERVICE**

I, Henry Laird, of the law firm of Jones Walker LLP do hereby certify that I have sent a true and correct copy of the foregoing Motion for Protective Order by using the ECF system to the following:

Douglas Handshoe  
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VIA UNITED STATES MAIL AND EMAIL: [earning04@gmail.com](mailto:earning04@gmail.com)

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This the 25<sup>th</sup> day of July, 2013.

s/ Henry Laird  
Henry Laird

Henry Laird (MSB No. 1774)  
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